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Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 UNITED STATES OF AMERICA,) NO. CR 13-00336 RS
) 12-10016CR-MARTINEZ
14 Plaintiff,)
) STIPULATION TO CONTINUE AND
15 v.) [PROPOSED] ORDER
)
16 DEAN TUAN TRINH,)
)
17 Defendant.)
)

18
19 The above-captioned matter came before the Court July 9, 2013, at 2:30 p.m. for a
20 status hearing. The Court put the matter over to August 6, 2013, at 2:30 p.m. The parties jointly
21 agreed that time should be excluded under the Speedy Trial Act because the defense attorney
22 requires additional time to review the discovery and conduct additional investigation. The
23 parties represent that granting the exclusion would allow the reasonable time necessary for
24 production and review of discovery and for effective preparation. See 18 U.S.C. §
25 3161(h)(7)(B)(iv). Therefore the parties request an exclusion of time from July 9, 2013 through
26 August 6, 2013, from any time limits applicable under 18 U.S.C. § 3161.

27 For the reasons stated above, the Court finds that the exclusion from the time
28 limits applicable under 18 U.S.C. § 3161 of the period from July 9, 2013 through August 6,

1 2013 is warranted and that the ends of justice served by the continuance outweigh the best
2 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The
3 failure to grant the requested exclusion of time would deny counsel for the defendant and for the
4 government the reasonable time necessary for effective preparation, taking into account the
5 exercise of due diligence, and would result in a miscarriage of justice. 18 U.S.C.
6 §3161(h)(7)(B)(iv).

8 DATED: July 10, 2013

/s/

WILLIAM SAFFORD
Attorney for Dean Tuan Trinh


10 DATED: July 10, 2013

/s/

MAUREEN C. BESSETTE
Assistant U.S. Attorney

13 IT IS SO ORDERED.

15 DATED: 7/10/13



HON. RICHARD SEEBORG
United States District Judge